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A LAW CORPORATION**

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Attorney for:
RAMON MALDONADO

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT of CALIFORNIA**

UNITED STATES OF AMERICA,)	Case No.: 1:23-CR-00169-JLT-SKO
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	VACATE THE TRIAL DATE AND
vs.)	CONTINUE THE CHANGE OF PLEA
)	DATE
RAMON MALDONADO,)	
)	
Defendant)	

TO: THE CLERK OF THE UNITED STATES DISTRICT COURT, HONORABLE JENNIFER L. THURSTON, AND KAREN ESCOBAR, ASSISTANT UNITED STATES ATTORNEY:

COMES NOW Defendant, RAMON MALDONADO, by and through his attorney of record, ALEKXIA TORRES STALLINGS, hereby requesting that the trial date currently set for March 4, 2025, be vacated, and that the change of plea hearing currently set for Tuesday, January 21, 2025, at 9:00 a.m., be continued to Monday, April 21, 2025, at 9:00 a.m.

Counsel is requesting a continuance due to being on maternity leave. Mr. Maldonado is aware of counsel's maternity leave and is willing to exclude time. I have spoken to AUSA Karen Escobar, and she has no objection to continuing the change of plea hearing. The parties also agree the delays resulting from the continuance shall be excluded in the interest of justice pursuant to 18 USC 3161 (h)(7)(A) and 3161 (h)(7)(B)(1) and (IV) because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that

the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO STIPULATED.

Respectfully Submitted,

DATED: January 23, 2025

/s/ *Alekxia Torres Stallings*

ALEKXIA TORRES STALLINGS
Attorney for Defendant
RAMON MALDONADO

DATED: January 23, 2025

/s/ *Karen Escobar*

KAREN ESCOBAR
Assistant U.S. Attorney

ORDER

IT IS SO ORDERED that the trial date of March 4, 2025 be vacated and the change of plea hearing currently set for Tuesday, January 21, 2025, at 9:00 a.m., be continued to Monday, April 21, 2025, at 9:00 a.m.

IT IS SO ORDERED.

Dated: **January 23, 2025**


UNITED STATES DISTRICT JUDGE